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FOR
OF VENUE
CD. OF N.Y.

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Dated: White Plains, New York
April 1, 2025

1. As per the Federal Rules of Bankruptcy Procedure ("FRBP") § Rule 1014(a)(1) relating to Change of Venue, if a petition is filed in the proper district, the court, on the timely motion of a party in interest or on its own motion, and after hearing on notice to the petitioners, the United States trustee, and other entities as directed by the court, may transfer the case to any other district if the court determines

that the transfer is in the interest of justice or for the convenience of the parties.

2. This could involve factors like ensuring fairness in legal proceedings or addressing potential conflicts.
3. It has become quite clear over the more than 2 years since the above referenced bankruptcy cases and their corresponding adversary proceedings have commenced, that the presiding SDNY Judge has openly and viciously expressed his outward hostility, intimidation, threats, verbal and physical abuse, psychological and physical torture, allowing his enemies and adversaries to commit crimes and torts against him without punishment or even reprimand, denied each and every motion, request, pleading, or letter request from Debtor since this case began, deprived him of Counsel when he could not afford to retain another one after his paid lawyer Bruce Bronson abruptly quit weeks after filing the cases, and other cruel and unusual targeting of the Debtor;
4. In addition, pursuant to the case files, this court and many of its participants are under criminal and civil investigation for similar if not identical misconduct and behavior, such that this case has now become a torture inquisition, rather than pursuit of Debtor's bankruptcy discharge.

5. Politics also plays a huge part in this case, as Judge Sean Lane is an Obama-appointed federal judge, while Debtor has always been a publicly well known President Donald Trump supporter and Republican, thus further angering Judge Sean Lane and his law clerks.
6. As some of the attached recent exhibits show (not even the full list filed and accumulated over the past more than 2 years) it has now become untenable and impossible for Debtor to experience a fair hearing or trial, and these aforementioned cases must be transferred to a different venue, in this case the Eastern District of New York (Debtor will even accept the Western District of New York if that is more expedient).
7. Coupled with the fact that the Southern District of New York District Court, and its Bankruptcy Court, as well as its various government and private participants, have removed Debtor's ability to file appeals on bad unfair illegal or unethical court decisions, have removed Debtor's ability to either file or receive notice through the Electronic Filing System ("ECF") while everyone else attacking Debtor has this ability, have colluded to deny Debtor notice of their filed pleadings countless times, routinely engage in ex parte communications and plots to work together to undermine Debtor and his cases, entrap Debtor by purposefully not responding to Debtor's communications so that he has filed motions in ignorance of the facts (so that Judge Sean Lane would get angry), and other forms of public and private corruption, it is

quite obvious that this case can no longer continue in this Southern District of New York district.

8. Even worse, when Debtor duly complains about these serious constitutional violations either formally or informally, SDNY Judge Sean Lane instead repeatedly brands Debtor as a "vexatious or frivolous litigator," which is then parroted by the various government or private parasites infecting these cases attacking Debtor, only to create a Kafka-esque torture chamber more akin to a Roman Gladiator session, with all sorts of proverbial lions, wild animals, other gladiators, and criminals tearing Debtor apart, limb from limb, all for the sick, twisted, and demented viewing pleasure and titillation of Judge Sean Lane and his "court."
9. For these reasons and more, Debtor requests immediate venue change from this Southern District of New York to the Eastern District of New York post haste, and without any further delay.

Dated: March 22, 2025
New Rochelle NY



Rahul Manchanda (Pro Se)
270 Victory Boulevard
New Rochelle, New York 10804
Tel: (646) 645-0993

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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IN THE MATTER OF

INDEX NOS. 23-22095, 23-11805
ADVERSARY PROCEEDING CASE NOS.
23-07008, 24-07009, 24-07010

RAHUL MANCHANDA,
MANCHANDA LAW OFFICE PLLC

AFFIRMATION IN SUPPORT OF
MOTION TO TRANSFER/CHANGE VENUE

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STATE OF NEW YORK }
 : ss
COUNTY OF WESTCHESTER }

RAHUL MANCHANDA affirms the following to be true under penalty of perjury:

1. I make this Affirmation in support of this Motion for Transfer/Change of Venue to the Eastern District of New York based upon my personal knowledge of the facts and experiences that I relate herein, based upon information and belief, and based on the contents of the file.

INTEREST OF JUSTICE

2. As per the Federal Rules of Bankruptcy Procedure ("FRBP") § Rule 1014(a)(1) relating to Change of Venue, if a petition is filed in the proper district, the court, on the timely motion of a party in interest or on its own motion, and after hearing on notice to the petitioners, the United States trustee, and other entities as directed by the court, may transfer the case to any other district if the court determines that the transfer is in the interest of justice or for the

convenience of the parties.


3. This could involve factors like ensuring fairness in legal proceedings or addressing potential conflicts.
4. It has become quite clear over the more than 2 years since the above referenced bankruptcy cases and their corresponding adversary proceedings have commenced, that the presiding SDNY Judge Sean Lane has openly and viciously expressed his outward hostility, personal hatred, intimidation, threats, verbal and physical abuse, psychological and physical torture, public humiliation, censorship, mockery, allowing his enemies and adversaries to commit crimes and torts against him without punishment or even reprimand, denied each and every motion, request, pleading, or letter request from Debtor since this case began, deprived him of Counsel when he could not afford to retain another one after his paid lawyer Bruce Bronson abruptly quit weeks after filing the cases, and other cruel and unusual targeting of the Debtor;
5. In addition, pursuant to the case file records, this court and many of its participants are under criminal and civil investigation for similar if not identical misconduct and behavior against Debtor, such that this case has now become a torture inquisition, rather than pursuit of Debtor's bankruptcy discharge.

6. Politics also plays a huge part in this case, as SDNY Judge Sean Lane is an Obama-appointed, Democrat, federal judge, while Debtor has always been a publicly well-known President Donald Trump supporter and Republican, thus further angering Judge Sean Lane and his law clerks.
7. As some of the attached recent exhibits show (not even the full list filed and accumulated over the past more than 2 years) it has now become untenable and impossible for Debtor to experience a fair hearing or trial, and these aforementioned cases must be transferred to a different venue, in this case the Eastern District of New York (Debtor will even accept the Western District of New York if that is more expedient).
8. Coupled with the fact that the Southern District of New York District Bankruptcy Appellate Court, and its Bankruptcy Court, as well as its various government and private participants, have unconstitutionally removed or attenuated Debtor's ability to file appeals on bad unfair illegal or unethical court decisions, have removed Debtor's ability to either file or receive notice through the Electronic Filing System ("ECF") or U.S. Mail, while everyone else attacking Debtor has this ability, have colluded to deny Debtor notice of their filed pleadings countless times, routinely engage in *ex parte* communications and plots to work together to undermine Debtor and his cases, entrap Debtor by purposefully not responding to Debtor's communications so that he has filed motions in ignorance of the facts (so that Judge Sean Lane would

have an excuse to get angry and therefore impose sanctions), and other forms of public and private corruption, it is quite obvious that this case can no longer continue in this Southern District of New York district.

9. Even worse, when Debtor duly complains about these serious constitutional violations, either formally or informally, SDNY Judge Sean Lane instead repeatedly brands Debtor as a "vexatious or frivolous litigator," which is then parroted by the various government or private parasites infecting these cases attacking Debtor, only to create a Kafka-esque torture chamber, more akin to a Roman Gladiator contest, with all sorts of proverbial lions, wild animals, other gladiators, and criminals tearing Debtor apart, limb from limb, all for the sick, twisted, demented viewing pleasure, and titillation of Judge Sean Lane and his "court."
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New Rochelle, NY



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CERTIFICATE OF SERVICE

On March 22, 2025, I, Rahul Manchanda, served a copy of this Motion to Transfer/Change Venue and any attached pages to SDNY Bankruptcy Court Judge Sean Lane, and any and all participants in these above referenced bankruptcy proceedings, via U.S. Mail and/or Hand Delivery to the SDNY Bankruptcy Court Clerks Office, located at 300 Quarropas Street, White Plains, New York NY 10601 to be transmitted via Electronic and/or U.S. Mail and/or Facsimile.



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